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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
PAUL ALEXANDER HODGE,
Defendant.

Case No. 2:21-CR-00200-RFB-VCF

**Stipulation To Continue Supervised
Release Revocation Hearing
(Fourth Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defendant and Benjamin F. Nemec, Assistant Federal Public Defender, counsel for Paul Alexander Hodge, ("Hodge"), that the supervised release revocation hearing in the abovementioned case, which is currently scheduled for May 27, 2025, be continued and reset to a date and time convenient to this Court, but not sooner than 90 days from the current hearing date for the following reasons:

1. On or about December 14, 2023, Hodge appeared on a criminal Complaint alleging that he committed Covid-19 Relief Funds Bank Fraud, a violation of 18 U.S.C. §

1 1344(2), and was released on conditions pending a preliminary hearing, which is
2 presently scheduled for March 24, 2025.

3 2. On or about December 13, 2023, a petition seeking to revoke Hodge's
4 supervised release was filed. At the June 11, 2024 initial appearance, Hodge was released
5 on bond pending a revocation hearing in this case, which is currently set for May 27,
6 2025 before this Court.

7 3. The parties have agreed to continue the supervised release revocation
8 hearing for at least 90 days. The parties have negotiated an agreed global resolution to
9 include the revocation violations¹ and the fraud matter. The parties need additional time
10 to allow the defendant sufficient time to discuss the written plea agreement with his
11 counsel before executing it and then to have the defendant plead guilty pursuant to the
12 terms of the agreement to a criminal information containing charge in the complaint,
13 Covid-19 Relief Funds Bank Fraud, in violation of 18 U.S.C. § 1344(2).

14 4. If the defendant does not execute the agreement or if the Court does not
15 accept his guilty plea, the parties will need additional time to adequately prepare for the
16 revocation hearing.

17 5. The defendant is at liberty and will not be unduly prejudiced by the brief
18 delay requested herein.

19 6. The parties agree to the continuance.

20 7. The additional time requested herein is not sought for purposes of delay,
21 but merely to allow the parties government sufficient time within which to adequately
22 prepare for the revocation hearing. Additionally, denial of this request for continuance
23

25 1 On or about December 14, 2023, a petition seeking to revoke Hodge's supervised
26 release was also filed. The revocation hearing in that matter is currently set for June 17,
2025 in case number 2:21-cr-93-KJD-BNW.

could result in a miscarriage of justice, and the ends of justice served by granting this request,

outweigh the best interest of the public and the defendant in a speedy hearing.

8. This is the fourth stipulation to continue the hearing.

DATED this 22nd day of May, 2025.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

SIGAL CHATTAH
United States Attorney

/s/ Benjamin F. Nemec
By _____
Benjamin F. Nemec
Assistant Federal Public Defender

/s/ Kimberly M. Frayn
By _____
KIMBERLY M. FRAYN
Assistant United States Attorney

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Findings of Fact, Conclusions of Law and Order

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On or about December 14, 2023, Hodge appeared on a criminal Complaint alleging that he committed Covid-19 Relief Funds Bank Fraud, a violation of 18 U.S.C. § 1344(2), and was released on conditions pending a preliminary hearing, which is presently scheduled for March 24, 2025.

2. On or about December 13, 2023, a petition seeking to revoke Hodge's supervised release was filed. At the June 11, 2024 initial appearance, Hodge was released on bond pending a revocation hearing in this case, which is currently set for May 27, 2025 before this Court.

3. The parties have agreed to continue the supervised release revocation hearing for at least 90 days. The parties have negotiated an agreed global resolution to include the revocation violations² and the fraud matter. The parties need additional time

² On or about December 14, 2023, a petition seeking to revoke Hodge's supervised release was also filed. The revocation hearing in that matter is currently set for June 17, 2025 in case number 2:21-cr-93-KJD-BNW.

1 to allow the defendant sufficient time to discuss the written plea agreement with his
2 counsel before executing it and then to have the defendant plead guilty pursuant to the
3 terms of the agreement to a criminal information containing charge in the complaint,
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6 accept his guilty plea, the parties will need additional time to adequately prepare for the
7 revocation hearing.

8 5. The defendant is at liberty and will not be unduly prejudiced by the brief
9 delay requested herein.

10 6. The parties agree to the continuance.

11 7. The additional time requested herein is not sought for purposes of delay,
12 but merely to allow the parties government sufficient time within which to adequately
13 prepare for the revocation hearing. Additionally, denial of this request for continuance
14 could result in a miscarriage of justice, and the ends of justice served by granting this
15 request,

16 outweigh the best interest of the public and the defendant in a speedy hearing.

17 8. This is the fourth stipulation to continue the hearing.

18 On or about December 14, 2023, Hodge appeared on a criminal Complaint
19 alleging that he committed Covid-19 Relief Funds Bank Fraud, a violation of 18 U.S.C. §
20 1344(2), and was released on conditions pending a preliminary hearing, which is
21 presently scheduled for March 24, 2025.

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ORDER

THEREFORE, IT IS HEREBY ORDERED that the revocation hearing in the above-captioned matters, currently scheduled for May 27, 2025, be vacated and continued to August 28, 2025 at 8:30 a.m.

a.m./p.m.

DATED this 23rd day of May, 2025.

8

HONORABLE RICHARD F. BOULWARE, II
UNITED STATES DISTRICT COURT JUDGE